

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF THE THREE HUNDRED SEVENTY-EIGHTH OMNIBUS OBJECTION TO CLAIMS SHOULD REVIEW THE OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OBJECTION AND/OR THE EXHIBIT ATTACHED THERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT  
 LEHMAN BROTHERS HOLDINGS INC.'S COUNSEL,  
 RYAN MARTIN, AT 212-310-8325.**

WEIL, GOTSHAL & MANGES LLP  
 767 Fifth Avenue  
 New York, New York 10153  
 Telephone: (212) 310-8000  
 Facsimile: (212) 310-8007  
 Robert J. Lemons

Attorneys for Lehman Brothers Holdings Inc.  
 and Certain of Its Affiliates

**UNITED STATES BANKRUPTCY COURT  
 SOUTHERN DISTRICT OF NEW YORK**

-----X	
<b>In re</b>	<b>: Chapter 11 Case No.</b>
	<b>:</b>
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	<b>: 08-13555 (JMP)</b>
	<b>:</b>
<b>Debtors.</b>	<b>: (Jointly Administered)</b>
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**NOTICE OF HEARING ON THREE HUNDRED SEVENTY-EIGHTH  
 OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

**PLEASE TAKE NOTICE** that on December 7, 2012, Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for the entities in the above-referenced chapter 11 cases, filed its three hundred seventy-eighth omnibus objection to claims (the “Three Hundred Seventy-Eighth Omnibus Objection to

Claims”), and that a hearing (the “Hearing”) to consider the Three Hundred Seventy-Eighth Omnibus Objection to Claims will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **January 30, 2013 at 10:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

**PLEASE TAKE FURTHER NOTICE** that any responses to the Three Hundred Seventy-Eighth Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and shall be served in accordance with General Order M-399 upon (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) attorneys for LBHI, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Robert J. Lemons, Esq. and Maurice Horwitz, Esq.); and (iii) the Office of the United States Trustee for Region 2, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq., Elisabetta Gasparini, Esq., and Andrea B. Schwartz, Esq.); so as to be so filed and received by no later than **January 9, 2013 at 4:00 p.m. (Eastern Time)** (the “Response Deadline”).

**PLEASE TAKE FURTHER NOTICE** that if no responses are timely filed and served with respect to the Three Hundred Seventy-Eighth Omnibus Objection to Claims or any

claim set forth thereon, the Plan Administrator may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Three Hundred Seventy-Eighth Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: December 7, 2012  
New York, New York

/s/ Robert J. Lemons

Robert J. Lemons

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

Attorneys for Lehman Brothers Holdings Inc.  
and Certain of Its Affiliates

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re** : **Chapter 11 Case No.**  
:   
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**  
:   
**Debtors.** : **(Jointly Administered)**  
-----X

**THREE HUNDRED SEVENTY-EIGHTH  
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED  
PROOFS OF CLAIM. PARTIES RECEIVING THIS THREE HUNDRED SEVENTY-  
EIGHTH OMNIBUS OBJECTION TO CLAIMS SHOULD REVIEW THE OBJECTION  
TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE  
OBJECTION AND/OR THE EXHIBIT ATTACHED THERETO TO DETERMINE  
WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT  
LEHMAN BROTHERS HOLDINGS INC.'S COUNSEL,  
RYAN MARTIN, AT 212-310-8325.**

TO THE HONORABLE JAMES M. PECK  
UNITED STATES BANKRUPTCY JUDGE:

Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”) for the entities in the above-referenced chapter 11 cases (the “Chapter 11 Estates”), respectfully represents as follows:

**Relief Requested**

1. The proofs of claim listed on Exhibit A annexed hereto relate in whole or in part to securities identified by ISIN XS0215349357 or ISIN XS0229269856 (the “Preferred Securities”). The Preferred Securities were neither issued nor guaranteed by an entity that is a debtor in these chapter 11 cases. The Chapter 11 Estates have no liability for the portions of the claims related to the Preferred Securities, whether liquidated, unliquidated or undetermined (such portions, the “No Liability Claims”).

2. Accordingly, the Plan Administrator files this omnibus objection, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “Procedures Order”) [ECF No. 6664], to disallow and expunge the No Liability Claims.

**Jurisdiction**

3. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

### **Background**

4. Commencing on September 15, 2008 and periodically thereafter, LBHI and certain of its subsidiaries commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. These chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b).

5. On July 2, 2009, this Court entered an order setting forth the procedures and deadlines for filing proofs of claim in these chapter 11 cases. [ECF No. 4271].

6. On January 14, 2010, this Court entered the Procedures Order, which authorizes the Chapter 11 Estates, among other things, to file omnibus objections on various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

7. On December 6, 2011, this Court entered an order confirming the Plan [ECF No. 23023]. The Plan became effective on March 6, 2012. Pursuant to the Plan, the Plan Administrator is authorized to interpose and prosecute objections to claims filed against the Chapter 11 Estates.

### **The No Liability Claims Should Be Disallowed and Expunged**

8. A filed proof of claim is “deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). If an objection refuting at least one of the claim’s essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelphia Commc’ns Corp.*, Ch. 11 Case No. 02-41729 (REG), 2007 Bankr. LEXIS 660 at \*15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000). Moreover, Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be

allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1).

9. In its review of the claims filed on the claims register in these chapter 11 cases and maintained by the Court-appointed claims agent, the Plan Administrator has identified the No Liability Claims as claims for which the Chapter 11 Estates have no liability because the Preferred Securities were neither issued nor guaranteed by the Chapter 11 Estates.

10. The Preferred Securities were issued by Lehman Brothers UK Capital Funding L.P. and Lehman Brothers UK Capital Funding II L.P. (together, the “Trusts”). The Preferred Securities were guaranteed by Lehman Brothers Holdings plc (“LBH plc”). Neither the Trusts nor LBH plc was a debtor in these cases. The No Liability Claims fail to articulate any legal or factual basis for a claim against a Chapter 11 Estate.

11. If the No Liability Claims remain on the claims register, the potential exists for recoveries by parties who do not hold valid claims against the Chapter 11 Estates. Accordingly, the Plan Administrator respectfully requests that the Court disallow and expunge in their entirety the No Liability Claims.

### **Reservation of Rights**

12. The Plan Administrator reserves all rights to object on any basis to any No Liability Claim as to which the Court does not grant the relief requested herein.

### **Notice**

13. No trustee has been appointed in these chapter 11 cases. Notice of this Three Hundred Seventy-Eighth Omnibus Objection to Claims has been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) the holder of each claim listed on Exhibit A; and (vi) all other parties entitled to notice in accordance

with the procedures set forth in the second amended order entered on June 17, 2010, governing case management and administrative procedures for these cases [ECF No. 9635]. The Plan Administrator submits that no other or further notice need be provided.

14. No previous request for the relief sought herein has been made by the Plan Administrator or the Chapter 11 Estates to this or any other Court.

WHEREFORE the Plan Administrator respectfully requests entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: December 7, 2012  
New York, New York

/s/ Robert J. Lemons  
Robert J. Lemons

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

Attorneys for Lehman Brothers Holdings Inc.  
and Certain of Its Affiliates

**EXHIBIT A**

**OMNIBUS OBJECTION 378: EXHIBIT A - NO LIABILITY CLAIMS**

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ISIN**	AMOUNTS TO BE DISALLOWED
1 ABE VENTURES	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/28/09	50339	XS0229269856	\$74,457.59
2 ADIZA HOLDINGS INC.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/23/09	45576	XS0229269856	\$139,980.26
3 AGOSTINHO LOURENCO RASCAO, MANUEL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/26/09	46956	XS0229269856	\$74,457.59
4 ANDORRA BANC AGRICOL REIG, S.A. ("ANDBANC")	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/02/09	63849	XS0229269856	\$686,312.00
5 BANCA ALETTI & C. S.P.A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/27/09	49740	XS0229269856	\$22,293.55
6 BANCA CARIGE SPA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/26/09	46901	XS0229269856	\$37,224.67
7 BANCA FIDEURAM SPA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	56173	XS0215349357 XS0229269856	\$511,315.19 \$44,592.95 \$555,908.14
8 BANCA FINNAT EURAMERICA SPA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/21/09	43350	XS0215349357	\$288,914.36
9 BANCA IMI SPA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/28/09	50330	XS0215349357	\$1,425.10 *
10 BANCA INTERMOBILIARE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55860	XS0229269856	\$94,311.84
11 BANCA MARCH, S.A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/02/09	63650	XS0229269856	\$1,429,251.00
The schedule attached to claim number 63650 listed \$11,429,251 as the amount of the claim related to the ISIN, but the total amount of the claim listed on the schedule to and the cover sheet of the proof of claim suggests that this is a typographical error. All portions of the claim related to the ISIN above shall be disallowed and expunged pursuant to this order.						

\* Plus unliquidated and/or undetermined amounts.

\*\* Only those portions of the claim related to the ISINs listed are subject to the Debtors' Three Hundred Seventy-Eighth Omnibus Objection.

**OMNIBUS OBJECTION 378: EXHIBIT A - NO LIABILITY CLAIMS**

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ISIN**	AMOUNTS TO BE DISALLOWED
12 BANCA POPOLARE DELL'EMILIA ROMAGNA SOC. COOP.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/27/09	49737	XS0215349357	\$168,994.00
13 BANCA SELLA HOLDING SPA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/30/09	59230	XS0229269856	\$14,548.86
14 BANK JULIUS BAER & CO. LTD.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/30/09	58786	XS0229269856	Undetermined *
15 BANK JULIUS BAER & CO. LTD.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/09/10	66929	XS0215349357	\$70,962.50
					XS0229269856	\$1,476,020.00
						<u>\$1,546,982.50</u>
16 BANK LEUMI USA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/30/09	59840	XS0229269856	\$224,430.07
17 BANK OF SINGAPORE LIMITED	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/19/09	41773	XS0215349357	\$327,635.00
					XS0229269856	\$376,068.00
						<u>\$703,703.00</u>
18 BANK OF VALLETTA P.L.C.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/30/09	58114	XS0229269856	\$3,491,415.00 *
19 BANK VONTOBEL AG	08-13555 (JMP)	Lehman Brothers Holdings Inc.	03/16/11	67373	XS0229269856	Undetermined *
20 BANKINTER, SA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/02/09	64023	XS0215349357	\$70,755.00
					XS0229269856	\$247,642.50
						<u>\$318,397.50</u>

\* Plus unliquidated and/or undetermined amounts.

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**OMNIBUS OBJECTION 378: EXHIBIT A - NO LIABILITY CLAIMS**

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ISIN**	AMOUNTS TO BE DISALLOWED
21 BANKINTER, SA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/02/09	64024	XS0215349357	\$227,831.10
					XS0229269856	\$2,578,312.20
						<u>\$2,806,143.30</u>
22 BANQUE LB LUX S.A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/30/09	60691	XS0229269856	\$506,874.28
23 BANQUE POPULAIRE COTE D'AZUR, MONACO	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/30/09	59233	XS0229269856	Undetermined *
24 BANQUE PRIVEE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/26/09	46890	XS0215349357	\$260,785.00
					XS0229269856	\$149,178.00
						<u>\$409,963.00</u>
25 BENTHEM, J.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/27/09	49387	XS0215349357	\$169,812.00
26 BLOMINVEST BANK S.A.L.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55155	XS0229269856	\$156,161.00
27 CASSA DI RISPARMIO DI BRA SPA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/26/09	46905	XS0229269856	\$22,296.48
28 CASSA DI RISPARMIO DI SALUZZO S.P.A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/27/09	49716	XS0229269856	\$7,431.19
29 CONSULNOR SERVICIOS FINANCIEROS SOCIEDAD DE VALORES, S.A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/27/09	47711	XS0229269856	\$247,642.50

\* Plus unliquidated and/or undetermined amounts.

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**OMNIBUS OBJECTION 378: EXHIBIT A - NO LIABILITY CLAIMS**

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ISIN**	AMOUNTS TO BE DISALLOWED
30 CREDIT ANDORRA, S.A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/30/09	60323	XS0215349357 XS0229269856	\$1,568,377.68 \$3,246,980.01 <hr/> \$4,815,357.69
31 DZ BANK AG DEUTSCHE ZENTRAL-GENOSSENSCHAFTSBA NK	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/02/09	63603	XS0229269856	\$65,500.00
32 EFG EUROBANK ERGASIAS SA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/02/09	62750	XS0229269856	\$465,567.90
33 F.E.J.M. BEMELMANS BEHEER B.V.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/28/09	53466	XS0215349357	\$70,905.00
34 FALASIA LTD	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/26/09	46339	XS0229269856	\$114,664.68
35 FELBAR FINANCE LTD	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/21/09	43171	XS0229269856	\$223,372.76
36 FRANKFURTER SPARKASSE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/22/12	200092	XS0229269856	Undetermined *
37 FRESA SA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/22/09	44247	XS0229269856	\$74,457.59
38 GONCALVES, CARLOS ALBERTO	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/23/09	44627	XS0229269856	\$148,915.17
39 GUTIERREZ-GAMERO COLL, ANTONIO /	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/23/09	44816	XS0229269856	Undetermined *
40 HIDALGO CHUECA, MARINO /	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/23/09	44753	XS0229269856	Undetermined *

\* Plus unliquidated and/or undetermined amounts.

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**OMNIBUS OBJECTION 378: EXHIBIT A - NO LIABILITY CLAIMS**

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ISIN**	AMOUNTS TO BE DISALLOWED
41 INTER LEBENSVERSICHERUNG AG	08-13555 (JMP)	Lehman Brothers Holdings Inc.	01/26/10	66166	XS0229269856	\$7,432,174.79 *
42 INTESA SANPAOLO PRIVATE BANKING S.P.A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/28/09	51234	XS0229269856	\$39,210.68
43 INTESA SANPAOLO SPA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/26/09	46878	XS0229269856	\$156,842.76
44 JIMOR INTERNATIONAL SA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/23/09	45595	XS0229269856	\$446,745.51
45 JULLENS-VENEMA, E.J.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/27/09	49133	XS0215349357	\$31,840.00
46 KRAUSKOPF, DIETER	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/14/09	12241	XS0215349357	\$14,236.00 *
47 L'AUXILIAIRE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/20/09	42415	XS0215349357	\$2,907,602.46
48 LEEUW J.A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/27/09	49017	XS0215349357	\$56,604.00
49 LEUMI PRIVATE BANK LTD	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/02/09	65272	XS0229269856	\$300,247.10
50 LUIS LOPEZ ARENAS, JOSE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/23/09	44732	XS0229269856	Undetermined *
51 MAYFLOWER INVESTMENTS OVERSEAS LIMITED	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/13/09	39766	XS0215349357	\$142,360.00
52 MERRILL LYNCH BANK (SUISSE) S. A.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/27/09	48665	XS0229269856	\$1,147,811.14

\* Plus unliquidated and/or undetermined amounts.

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**OMNIBUS OBJECTION 378: EXHIBIT A - NO LIABILITY CLAIMS**

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ISIN**	AMOUNTS TO BE DISALLOWED
53 MITTELBRANDENBURGISCHE SPARKASSE IN POTSDAM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/22/12	200115	XS0229269856	Undetermined *
54 NORWICH CORPORATION	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/19/09	40957	XS0229269856	\$1,055,411.53
55 OFI ALPHA ALTERNATIVE MANDATES	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/02/09	64117	XS0229269856	\$19,297,623.27
56 PETERCAM BANK N.V.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/02/09	36123	XS0229269856	\$34,546.40
57 PICTET & CIE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/03/09	64249	XS0215349357 XS0229269856	\$451,932.62 \$55,147.72 \$507,080.34
58 PIETERSEN, KIRSTEN P	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/28/09	53173	XS0229269856	\$76,045.61
59 RAVESLOOT BEHEER BV.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/28/09	53304	XS0215349357	\$148,073.28 *
60 RBC DOMINION SECURITIES	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/28/09	51231	XS0229269856	\$78,871.98
61 RBS COUTTS BANK AG	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/23/09	45221	XS0215349357 XS0229269856	\$44,016.90 \$99,393.00 \$143,409.90
62 ROTHSCHILD BANK AG (AS NOMINEE)	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	56031	XS0229269856	\$366,653.93

\* Plus unliquidated and/or undetermined amounts.

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**OMNIBUS OBJECTION 378: EXHIBIT A - NO LIABILITY CLAIMS**

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ISIN**	AMOUNTS TO BE DISALLOWED
63 SA NOSTRA - CAIXA DE BALEARS	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55749	XS0229269856	\$133,898.85
64 SANTANDER PRIVATE BANKING SPA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/26/09	46908	XS0215349357	\$28,763.20
65 SCHEUTER, JOSEF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/05/09	36524	XS0229269856	\$39,706.80
66 SCHNABEL, ELSE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	55813	XS0229269856	Undetermined *
67 SCHUSTER DR. JOERG	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/28/09	35139	XS0229269856	\$22,739.20
The entirety of claim number 35139 shall be disallowed and expunged pursuant to this order. By order, dated August 25, 2011, the Court disallowed and expunged the balance of the claim, which related to a second security.						
68 SEMPER CONSTANTIA PRIVATBANK AG	08-13555 (JMP)	Lehman Brothers Holdings Inc.	04/06/10	66501	XS0229269856	\$142,010.00 *
69 SG PRIVATE BANKING SUISSE SA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/06/09	36532	XS0229269856	\$581,767.00
70 SNS GLOBAL CUSTODY B.V. / CLTS SNS SECURITIES	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	56666	XS0229269856	\$78,780.88
					XS0215349357	Undetermined *
						\$78,780.88
71 SNS SECURITIES NV	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/29/09	56652	XS0215349357	\$228,234.23
					XS0229269856	\$743,215.84
						\$971,450.07
72 SPARKASSE KOLNBONN	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/22/12	200149	XS0229269856	Undetermined *

\* Plus unliquidated and/or undetermined amounts.

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**OMNIBUS OBJECTION 378: EXHIBIT A - NO LIABILITY CLAIMS**

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ISIN**	AMOUNTS TO BE DISALLOWED
73 STAALBANKIERS N.V.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/02/09	62700	XS0215349357	\$254,718.00
74 TIJHUIS, J.A.M.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/02/09	63094	XS0215349357	\$13,000.00
75 TRANSXCOM B.V.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/02/09	63186	XS0215349357	\$1,788,898.48
76 UBS AG	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/30/09	59233	XS0215349357	Undetermined *
					XS0229269856	Undetermined *
						Undetermined
77 VAN MEURS, JOSJA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/28/09	52619	XS0229269856	\$14,929.00
78 WIERING, L.J.R.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/02/09	63185	XS0215349357	\$1,846,651.45
					TOTAL	\$ 60,478,775.18

\* Plus unliquidated and/or undetermined amounts.

\*\* Only those portions of the claim related to the ISINs listed are subject to the Debtors' Three Hundred Seventy-Eighth Omnibus Objection.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re** : **Chapter 11 Case No.**  
 :  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**  
 :  
**Debtors.** : **(Jointly Administered)**  
-----X

**ORDER GRANTING THREE HUNDRED SEVENTY-EIGHTH  
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Upon the three hundred seventy-eighth omnibus objection to claims, dated December 7, 2012 (the “Three Hundred Seventy-Eighth Omnibus Objection to Claims”),<sup>1</sup> of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, pursuant to section 502(b) of title 11 of the United States Code, Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking to disallow and expunge the No Liability Claims, all as more fully described in the Three Hundred Seventy-Eighth Omnibus Objection to Claims; and due and proper notice of the Three Hundred Seventy-Eighth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Three Hundred Seventy-Eighth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Three Hundred Seventy-Eighth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

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<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Three Hundred Seventy-Eighth Omnibus Objection to Claims.

ORDERED that the relief requested in the Three Hundred Seventy-Eighth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, all portions of the claims listed on Exhibit 1 annexed hereto that relate to the securities identified by ISIN XS0215349357 or ISIN XS0229269856, whether liquidated, unliquidated or undetermined, are disallowed and expunged with prejudice; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2013  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE